

# **Instruction for use of “Notification of Compliance Status” Form**

## **General**

This form may be used by facilities that operate asphalt processing or asphalt roofing products manufacturing operations (affected sources) to comply with the notification of compliance status requirements in 16.9.10 or 16.9.11 of Regulation 1138. The use of this form is optional. However, other means of notification must contain the information required under 3.9.8.2 of Regulation 1138.

## **Required Submittal Date**

The owner or operator shall submit a notification of compliance status to the Department (with copy to the U.S. Environmental Protection Agency) by the following dates.

- No later than 60 days following the completion of the performance test for affected sources that conducted the performance test on or after December 2, 2010.
- No later than May 30, 2011 for existing sources, if the owner or operator is using the results from a previously-conducted (before December 2, 2010) performance test to demonstrate initial compliance.
- No later than 240 days following startup or December 11, 2010 for new or reconstructed sources, whichever is later, if the owner or operator is using the results from a previously-conducted (before December 2, 2010) performance test to demonstrate initial compliance.

The addresses for this submittal are provided below and in Item 13 of the “Notification of Compliance Status” form.

## **Items 1**

Provide the name of the affected asphalt processing or asphalt roofing products manufacturing operation.

## **Items 2**

Provide the physical location of the affected asphalt processing or asphalt roofing products manufacturing operation.

## **Items 3**

Provide the name of the owner or operator of the affected asphalt processing or asphalt roofing products manufacturing operation identified in Items 1 and 2.

## **Item 4**

Identify which EPA methods were used (circling the applicable methods) during the performance tests to determine initial compliance with the emission limitations of Section 16. If other methods were used during the performance test, identify those methods under “Other methods used”.

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## **Item 5**

Identify (checking the appropriate box) whether polycyclic aromatic hydrocarbons (PAHs) or particulate matter (PM) was measured during the performance test. PM is a surrogate for PAHs.

Using the performance test results, calculate and provide in the applicable reporting table of Item 5 either (1) the quantity of PAH emissions or (2) the quantity of PM emissions from each emission point subject to the requirements of Section 16. The quantities of the emissions must be provided in the units given in the reporting tables of Item 5.

Additionally, identify the type of asphalt roofing products manufacturing operation associated with each applicable emission point. In the column provided, indicate a coater-only type of operation with a “C”, a saturator-only type of operation with an “S”, or a type of combined coater and saturator operation with a “CS”.

If the number of emission points exceeds the available rows in the reporting tables of Item 5, continue on blank paper and attached to the “Notification of Compliance Status” form. **Alternatively**, if the total number of emission points exceeds the available rows, all emission point information may be reported on a separated document and attached to the “Notification of Compliance Status” form.

## **Item 6**

If the owner or operator uses a control device to comply with the emission limitations of Section 16, provide a description of the air pollution control equipment for each applicable emission point in the reporting table of Item 6. The description should include, at minimum,

- A physical description of the control device,
- The value or range of values for the control system parameter(s) that define compliant operation, and
- The control efficiency of the air pollution control equipment, if known, or indicate that the control efficiency is unknown.

If the owner or operator does not use a control device to comply with the emission limitations of Section 16, provide a description of the process operating condition for each applicable emission point in the reporting table of Item 6. The description should include, at minimum,

- A description of site-specific process operating condition(s).
- The value or range of values for the operating parameter(s) that defines compliant operation, and
- The control efficiency of the compliant process condition(s), if known, or indicate that the control efficiency is unknown.

## **Item 7**

Provide a description of the methods that will be used to determine continuous compliance for each of the emission points in the reporting table of Item 7. The description should include, at minimum,

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## **Item 7 - Continued**

- A description of the monitoring equipment,
- A description of the data recording equipment,
- A description of the data reduction methodology for compliance assessment and deviation reporting purposes, and
- Any test methods associated with the continuous parameter monitoring system.

## **Item 8**

Indicate (checking the appropriate box) whether the performance test results used to demonstrate initial compliance with Section 16 of Regulation 1138 were based on previously-conducted performance tests or performance testing conducted on or after the December 2, 2010.

## **Item 9**

If results from a previously-conducted performance test were used to demonstrate initial compliance with Section 16 (e.g. “Yes” was check in Item 8), the owner or operator must answer (checking the appropriate boxes) the four questions in Item 9. The response to these four questions would be used to certify that the use of the previously-conducted performance test results was appropriate.

## **Item 10**

The owner or operator shall certify (checking the box) that the source has complied with all applicable requirements of Section 16 of Regulation 1138. If the owner or operator certified (e.g. checked the box) that the source has complied with all applicable requirements of Section 16, the owner or operator can skip Item 14 on Page 5.

If the owner or operator is unable to certify that the source has complied with all applicable requirements at the time the notification of compliance status must be submitted, the owner or operator would not check the box in Item 10. Instead, the owner or operator would complete Item 14 on Page 5 of the “Notification of Compliance Status” form and include Page 5 in the submittal.

## **Item 11**

A responsible person, as defined in 3.2 of Regulation 1138, must certify that the statements and information contained in the notification of compliance status are true, accurate, and complete. The responsible person must also sign the “Notification of Compliance Status” form and provide the information requested.

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### **Item 12**

Include the following with the “Notification of Compliance Status” form submittal:

- The performance test results,
- The continuous parameter monitoring system performance evaluation results, and
- The results of other monitoring procedures or methods that were conducted in order to demonstrate initial compliance with Section 16.

### **Item 13**

The owner or operator must submit the completed “Notification of Compliance Status” form to the Department of Natural Resources and Environmental Control (with a copy to the U.S. Environmental Protection Agency) at the addresses provided below and in Item 13 of the form. The owner or operator should keep a copy of the completed form.

### **Submit the Notification of Compliance Status to the following addresses**

Delaware Department of Natural Resources and  
Environmental Control  
Director of Air Quality  
Blue Hen Corporate Center  
655 S. Bay Road Suite 5N  
Dover, DE 19901

U. S. Environmental Protection Agency  
Director, Air Protection Division  
1650 Arch Street  
Philadelphia, PA 19103

### **Item 14**

If the affected asphalt processing or asphalt roofing products manufacturing operation is not in compliance with the applicable requirements of Section 16 of Regulation 1138 at the time of submitting the notification of compliance status, the owner or operator must provide a complete explanation of the noncompliance, the corrective actions being undertaken to bring the asphalt processing or asphalt roofing products manufacturing operation into compliance, and the expected date that compliance will be demonstrated. Space for this information is provided in Item 14 on page 5 of the form. The owner or operator should use and attach additional paper, if additional space is needed.

# Notification of Compliance Status

## Regulation 1138 – Section 16

### Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

**Submittal Date:** If the performance test was conducted on or after December 2, 2010, the notification of compliance status must be submitted no later than 60 days following the completion of the performance test. If the performance test was conducted prior to December 2, 2010, the notification of compliance status must be submitted in accordance with the instructions for the use of the “Notification of Compliance Status” form, see page 1 of 4 of the instructions.

[1] **Name of the facility:**

[2] **Physical location – Street Address:** \_\_\_\_\_

City, State, Zip Code : \_\_\_\_\_

[3] **Name of Owner or Operator:**

[4] **Identify the methods from Appendix A of 40 CFR Part 60 that were used to determine initial compliance.**

Circle the applicable methods used

- |  |    |    |    |    |    |    |
|--|----|----|----|----|----|----|
| • To select the sampling locations and the number of traverse points     | 1  | 1A |    |    |    |    |
| • To determine the velocity and volumetric flow rate                     | 2  | 2A | 2C | 2D | 2F | 2G |
| • To determine the gas molecular weight used for flow rate determination | 3  | 3A | 3B |    |    |    |
| • To measure the moisture content of the stack gas                       | 4  |    |    |    |    |    |
| • To measure the PM emissions  | 5A |    |    |    |    |    |
| • To measure the PAH emissions   | 23 |    |    |    |    |    |
| • Other methods used   |    |    |    |    |    |    |

[5] **Identify the types and quantity of hazardous air pollutants emitted from the asphalt processing and asphalt roofing products manufacturing operations.**

During the performance testing, were the results used to determine compliance based on measuring polycyclic aromatic hydrocarbons (PAHs) or on measuring particulate matter (PM), as a surrogate for PAHs?

Check applicable box below

☐

Measured PAHs

☐

Measured PM, as a surrogate

Asphalt processing emission points	Lbs / ton of asphalt charged to the blowing still	
	PAH emissions	PM emissions
AP emission point #1		
AP emission point #2		
AP emission point #3		

Asphalt roofing products manufacturing emission points	Type of operation <sup>A</sup>	Lbs / ton of asphalt roofing product manufactured	
		PAH emissions	PM emissions
RP emission point #1			
RP emission point #2			
RP emission point #3			
RP emission point #4			
RP emission point #5			

**Note A:** Indicate the type of operation with “C” (coater only), “S” (saturator only) or “CS” (combined saturator & coater)

# **Notification of Compliance Status**

## **Regulation 1138 – Section 16**

### **Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations**

- [6] Provide a description of the air pollution control equipment (or process conditions) for each emission point, including each control device (or process conditions) for polycyclic aromatic hydrocarbons (or its surrogate particulate matter) and the control efficiency (percent) for each control device (or process condition).

<b><u>Emission points</u></b>	<b><u>Description of the air pollution control equipment (or process conditions, if a control device is not required)</u></b>	<b><u>Control Efficiency, %</u></b>
AP emission point #1		
AP emission point #2		
AP emission point #3		
RP emission point #1		
RP emission point #2		
RP emission point #3		
RP emission point #4		
RP emission point #5		

# **Notification of Compliance Status**

## **Regulation 1138 – Section 16**

### **Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations**

**Name of the facility:**

**[7] Describe the methods that will be used for determining continuing compliance for each emission point, including a description of the monitoring requirements, the reporting requirements, and the test methods.**

<b><u>Emission points</u></b>	<b><u>Description of monitoring requirements, the reporting requirements, and the test methods that will be used to determine continuing compliance</u></b>
AP emission point #1	
AP emission point #2	
AP emission point #3	
RP emission point #1	
RP emission point #2	
RP emission point #3	
RP emission point #4	
RP emission point #5	

# **Notification of Compliance Status**

## **Regulation 1138 – Section 16**

### **Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations**

- [8] **Was the performance test, upon which the determination of initial compliance was made, conducted prior to December 2, 2010?**

**Check applicable box below**

☐ Yes, before 12/2/10 ☐ No, on or after 12/2/10

- [9] **If “Yes” is checked in Item 8 above, the owner or operator shall answer the questions below. If “No” is checked in Item 8, the owner or operator skips Item 9 and proceeds to Item 10.**

Indicate with a check mark the answer to the following questions.	Check, as appropriate	
	<u>Yes</u>	<u>No</u>
Was the previous performance test conducted within the last 5 years?		
Have any changes been made to the process since the date of the previous performance test?		
Did the operating conditions, test methods, and test procedures used for the previous performance test conform to the requirements of 3.7, 16.5.8, and 16.8 of Regulation 1138?		
Was the data used to establish the value or range of values of the process or control system parameters, as specified in 16.6.1, 16.6.2, 16.6.4, 16.6.6, or 16.6.7 of Regulation 1138, recorded during the previous performance test?		

- [10] **The owner or operator shall certify compliance with Section 16 of Regulation 1138 by checking the box of the following compliance statement, if appropriate.**

☐

I, the owner or operator, certify that the source has complied with all applicable requirements of Section 16 of Regulation 1138.

**If the owner or operator cannot certify compliance with all applicable requirements of Section 16 of Regulation 1138 above, the owner or operator provides the information needed in Item 14 on Page 5.**

- [11] **I certify that all the statements and information contained in this notification are true, accurate, and complete.**

Printed Name: \_\_\_\_\_

Title/Position: \_\_\_\_\_ Telephone No: \_\_\_\_\_

Email Address: \_\_\_\_\_

Signature: \_\_\_\_\_ Date : \_\_\_\_\_

- [12] **ATTACH the following to this “Notification of Compliance Status” form, (1) the performance test results, (2) the continuous parameter monitoring system performance evaluation results, and (3) the results of other monitoring procedures or methods that were conducted in order to demonstrate initial compliance with Section 16.**

- [13] **The owner or operator must submit this “Notification of Compliance Status” form with attachments to the following agencies by the submittal date provided on page 1 of this form. Remember to keep a copy of this notification.**

Delaware Department of Natural Resources  
and Environmental Control  
Director of Air Quality  
Blue Hen Corporate Mall  
655 S. Bay Road, Suite 5N  
Dover, DE 19901

U. S. Environmental Protection Agency  
Director, Air Protection Division  
1650 Arch Street  
Philadelphia, PA 19103



# **Notification of Compliance Status**

## **Regulation 1138 – Section 16**

### **Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations**

**Name of the facility:**

**[14] If the owner or operator did not certify initial compliance with all applicable requirements of Section 16 in Item 10, provide a complete explanation of the noncompliance, a description of the corrective actions being taken to achieve compliance, and the expected date for achieving compliant operation.**